



349998



November 25, 2009

Mr. Sam Chummar
Work Assignment Manager (SR-6J)
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard
Chicago, IL 60604

**Subject: Building Inspection Summary for November 10 through 12, 2009
Plainwell Mill Site, Operable Unit 7 of
Allied Paper/Portage Creek/Kalamazoo River Site
Plainwell, Kalamazoo County, Michigan
Contract No. EP-S5-06-02, Work Assignment No. 041-RSBD-059B**

Dear Mr. Chummar:

SulTRAC has prepared the enclosed summary to document inspection activities from November 10 through 12, 2009. Conestoga-Rovers & Associates, Inc. (CRA) and SulTRAC conducted the inspection of the Mill Building, the Former Quality Products Building, and the Specialty Minerals Building at the Plainwell Mill Superfund Site in Plainwell, Michigan. Weyerhaeuser Company is the responsible party for the site. In addition to conducting the inspections at the buildings identified above, CRA and SulTRAC staked proposed Phase II remedial investigation sampling locations. Appendix A of this summary contains a photographic log of the inspection event, and Appendix B contains SulTRAC's field oversight notes.

If you have any questions about the enclosed summary, please call me at (312) 201-7491.

Sincerely,

Jeffrey J. Lifka
Project Manager

Enclosure

cc: Norvelle Merrill-Crawford, EPA Contracting Officer (letter only)
Ron Riesing, SulTRAC Program Manager (letter only)
Ray Mastrolonardo, P.G., SulTRAC Hydrogeologist
Tracey Koach, SulTRAC Environmental Scientist
File

ENCLOSURE

**BUILDING INSPECTION SUMMARY
NOVEMBER 10 THROUGH 12, 2009
PLAINWELL MILL SITE, OPERABLE UNIT 7 OF
ALLIED PAPER/PORTAGE CREEK/KALAMAZOO RIVER SITE
PLAINWELL, KALAMAZOO COUNTY, MICHIGAN**

(Six Pages)

**BUILDING INSPECTION SUMMARY
NOVEMBER 10 THROUGH 12, 2009
PLAINWELL MILL SITE, OPERABLE UNIT 7 OF
ALLIED PAPER/PORTAGE CREEK/KALAMAZOO RIVER SITE
PLAINWELL, KALAMAZOO COUNTY, MICHIGAN**

SulTRAC Field Personnel: Tracey Koach and Ray Mastrolonardo
Reporting Period: November 10 through 12, 2009

INTRODUCTION

As requested by the U.S. Environmental Protection Agency (EPA) under contract number EP-S5-06-02 and work assignment number 041-RSBD-059B, SulTRAC oversaw the Mill Building, Former Quality Products Building, and Specialty Minerals Building inspections at the Plainwell Mill Superfund (Plainwell) Site in Plainwell, Michigan. Weyerhaeuser Company (Weyerhaeuser) is the responsible party for the site, and its environmental contractor is Conestoga-Rovers and Associates, Inc. (CRA). In addition to conducting the inspections at the buildings identified above, CRA and SulTRAC staked proposed Phase II remedial investigation (RI) sampling locations.

This report summarizes SulTRAC's oversight during the period from November 10 through 12, 2009; issues and developments that arose during the inspection; and future activities planned for the site. Appendix A contains a photographic log of SulTRAC's field oversight activities including photograph numbers 1 through 13 (photograph references appear in Tables 1, 2 and 3). A copy of SulTRAC's field oversight notes is included in Appendix B.

INSPECTION ACTIVITIES

As requested by EPA, SulTRAC oversaw inspection activities at the Plainwell site from November 10 through 12, 2009. The inspections consisted of a walk-through of each of the three buildings. At each inspection, two members of CRA (Jodie Dembowski and Emily Stahl) and two members of SulTRAC (Tracey Koach and Ray Mastrodonardo) were present. CRA provided maps of the Mill Building, and both parties conducted visual observations, recorded notes, and took pictures at various locations in each building. A summary of daily activities is presented below, and summaries of general observations during the inspection of each building are provided in Tables 1 through 3.

Tuesday, November 10, 2009

At about 10:15 a.m. (local time), SulTRAC representatives Tracey Koach and Ray Mastrodonardo arrived at the site and met CRA personnel Jodie Dembowski and Emily Stahl. The weather was overcast with a high temperature of about 50 degrees Fahrenheit (°F) during the day.

CRA conducted a health and safety briefing at the former wastewater lab building, and SulTRAC attended the briefing. After the health and safety briefing, CRA guided SulTRAC on a quick tour around the site to acquaint SulTRAC with the different areas and buildings. After the site tour, CRA conducted the inspection in the former Quality Products building area. General observations during this inspection are listed in Table 1. The former Quality Products building area includes remnants of the old structure and an aboveground tank, and the former wastewater laboratory includes a warehouse and distribution building. No manufacturing is believed to have occurred at this site. After inspection of the former Quality Products building, CRA began the inspection of the Mill Building. General observations during this inspection are listed in Table 2. CRA completed part of the Mill Building inspection and deferred the remainder of that inspection until the following day. SulTRAC left the site around 4:30 p.m.

Wednesday, November 11, 2009

SulTRAC arrived at the site at about 8:00 a.m. SulTRAC representatives Tracey Koach and Ray Mastrodonardo met CRA personnel Jodie Dembowski and Emily Stahl. The weather was mostly sunny with a high temperature of about 50 °F during the day.

CRA conducted a health and safety briefing at the former Quality Products area, and SulTRAC attended the briefing. After the health and safety briefing, CRA continued the Mill Building inspection and completed the inspection around noon. CRA then conducted an exterior inspection of the Mill Building. General observations during this inspection are listed in Table 2. After that building inspection, CRA and SulTRAC performed a reconnaissance of the north side of the Mill Building (between the building and the Kalamazoo River) to identify any features that could be associated with features observed inside the building.

CRA marked proposed monitoring well locations (1) around the Mill building and the proposed test pit locations in the area of the 200,000-gallon, fuel oil, aboveground storage tank; and (2) in the former coal pile storage area. Proposed test pit TP-306 was moved closer to the northeast corner of the Specialty Minerals building, where an observed subsidence could have resulted from installation or removal of an underground line or pipe extending from the Specialty Minerals building toward the Mill building.

Proposed test pit TP-201 was offset approximately 10 feet to the east to avoid the natural gas line marked on the Mill building parking lot. Proposed monitoring well MW-17 was offset to the south to avoid several underground utilities.

CRA contracted a private utility locator to mark all underground utilities on the combined sites. The utility locator was expected on site the following morning of Thursday, November 12, 2009. SulTRAC left the site around 5:00 p.m.

Thursday, November 12, 2009

SulTRAC arrived at the site at about 8:00 a.m. SulTRAC representatives Tracey Koach and Ray Mastrolonardo met CRA personnel Jodie Dembowske and Emily Stahl. The weather was partly sunny with a high temperature of about 50 °F during the day.

CRA conducted a health and safety briefing at the former Quality Products area, and SulTRAC attended the briefing. After the health and safety briefing, CRA inspected the former Specialty Minerals Building. General observations during this inspection are listed in Table 3. After completing the inspection, CRA began staking proposed sampling locations in the former lagoon area. CRA used hand-held global positioning system (GPS) equipment to identify the proposed locations. CRA and SulTRAC then determined where to place the stakes based on field observations.

The last area to be staked was the wooded area located in Area 1 (see Photograph No. 13 in Appendix A). Chain-link fencing was present; therefore, about half of this area was inaccessible because the gate was locked. It was determined that sampling locations within the locked, fenced-in area could be staked at a later time, possibly concurrent with sampling activities. SulTRAC left the site around 3:30 p.m.

ISSUES AND DEVELOPMENTS

No significant issues were identified during the building inspections and staking of sampling locations; however, SulTRAC identified the following items that should be addressed:

- A portion of the wooded area in Area 1 was not accessible due to chain-link fencing. Therefore, proposed sampling locations SB-149, SB-150, and SB-152 still must be located and staked.
- CRA decided in the field to switch the locations of SB-139 and MW-15 near the former secondary clarifier. This change must be documented in the revised project plans to be submitted by CRA.
- A concrete structure (possibly an old foundation) was identified in Area 3 northeast of the Specialty Minerals building and southeast of the former Quality Products building. CRA personnel stated that they would propose sampling locations near the concrete structure.
- One proposed soil boring location in Area 3 near the coal tunnel (SB-308) cannot be accessed with a drill rig; therefore, hand augering was proposed.

FUTURE ACTIVITIES

SulTRAC will review the work plan amendment to be prepared by CRA that includes a summary of building inspection activities and proposed additional sampling locations. SulTRAC will also oversee Phase II RI activities at the site as requested by EPA. EPA may require CRA to conduct follow-up inspection(s), and SulTRAC would oversee those activities.

TABLE 1
SUMMARY OF KEY OBSERVATIONS AT FORMER QUALITY PRODUCTS BUILDING

INTERIOR OBSERVATIONS	
Numerous floor drains and manhole grates within the building and in the garage area (see Photograph No. 1 in Appendix A)	
A containment pad with a floor drain inside the building	
EXTERIOR OBSERVATIONS	
A sludge tank behind the main building (see Photograph No. 2 in Appendix A)	

TABLE 2
SUMMARY OF KEY OBSERVATIONS AT FORMER PLAINWELL MILL BUILDING

INTERIOR OBSERVATIONS	
An extensive floor drain system throughout the building (see Photograph No. 3 in Appendix A)	
Evidence of oily machine pads and pits (see Photograph No. 4 in Appendix A)	
Areas marked off as "asbestos hazard" (see Photograph No. 5 in Appendix A)	
Numerous tanks and vats present throughout (see Photograph No. 6 in Appendix A)	
Numerous pipes leading into concrete slab—some cut off and some intact	
Evidence of corroded/deteriorated floor drains (Building 5 for example)	
Old sump pits (possible dry wells) that were once outside of the original Mill building (Building 5B/6A) (see Photograph No. 7 in Appendix A)	
Evidence of floor drains leading outside toward the Kalamazoo River (Buildings 3 and 28)	
EXTERIOR OBSERVATIONS	
Manholes possibly leading to outfalls at north side of building leading to river (see Photograph No. 8 in Appendix A)	
Two outfalls located at bank of river	
Evidence of piping and concrete pads—probably former tank locations on north side of building	
Manholes with pipes connecting from outside and from within the building on north side of building	
Tanks labeled "starch," "aqua ammonia," "clay titanium," and "high and low bright" on west side of building	

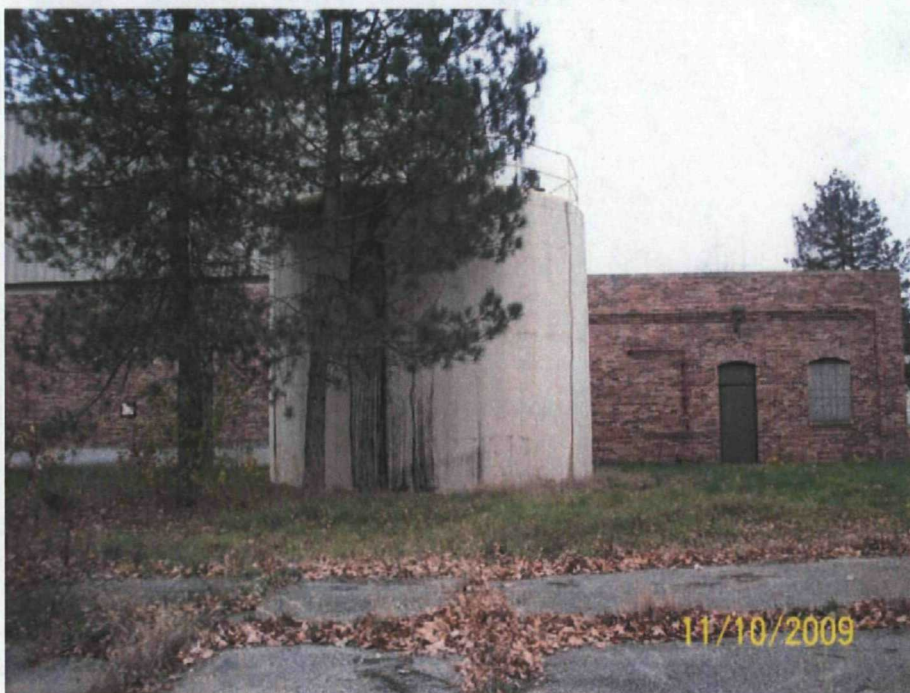
TABLE 3
SUMMARY OF KEY OBSERVATIONS AT FORMER SPECIALTY MINERALS BUILDING

INTERIOR OBSERVATIONS	
An extensive floor drain system throughout the building (see Photograph No. 9 in Appendix A)	
Numerous tanks and vats present throughout—some labeled “calcium carbonate” and “slake,” and some unlabeled	
Numerous pipes leading into concrete slab—some cut off and some intact	
Acid tank station with former tank pad	
Evidence of corroded/deteriorated floor drains (especially near acid tank station) (see Photograph No. 10 in Appendix A)	
Various pipes leading in/out of building marked “cooling water,” “calcium carbonate,” “wastewater,” and “process lines”	
Cut off pipe going out to calcium carbonate silos	
EXTERIOR OBSERVATIONS	
Asphalt “cuts” located at west side of building—possibly for below-grade process lines	
Asphalt “cuts” extending across parking lot toward fuel oil tank area and Mill building (see Photograph No. 11 in Appendix A)	
Two large silos marked “calcium carbonate” (see Photograph No. 12 in Appendix A)	
One large unmarked silo	

APPENDIX A
SULTRAC PHOTOGRAPHIC LOG
(Seven Pages)



Photograph No. 1
 Orientation: Overview
 Description: Floor drains in former wastewater lab.
 Location: Plainwell Mill
 Date: November 10, 2009



Photograph No. 2
 Orientation: East
 Description: Suspected sludge tank adjacent to former wastewater lab building (view from former Quality Products building).
 Location: Plainwell Mill
 Date: November 10, 2009



Photograph No. 3

Location: Plainwell Mill

Orientation: Overview

Date: November 11, 2009

Description: Floor drains in Mill Building.



Photograph No. 4

Location: Plainwell Mill

Orientation: Overview

Date: November 11, 2009

Description: Oily machine pad in Mill Building.



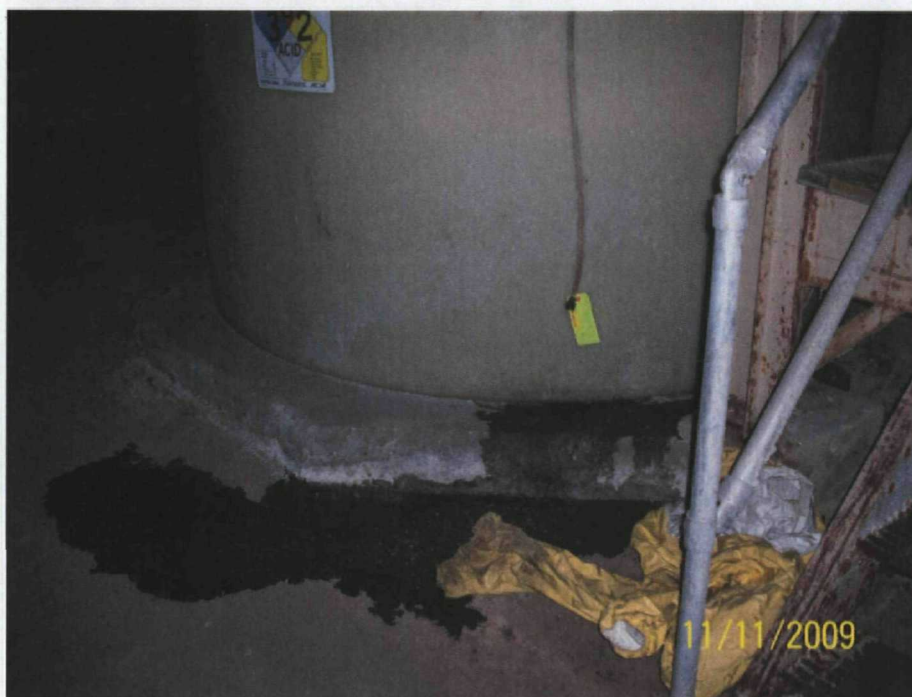
Photograph No. 5

Location: Plainwell Mill

Orientation: Overview

Date: November 10, 2009

Description: Marked-off asbestos area in Mill Building.



Photograph No. 6

Location: Plainwell Mill

Orientation: Overview

Date: November 11, 2009

Description: Example of aboveground storage tank in Mill Building.



Photograph No. 7
 Orientation: Overview
 Description: One of the old sump pits that had been outside the original Mill building—now inside one of the additions.

Location: Plainwell Mill
 Date: November 11, 2009



Photograph No. 8
 Orientation: South
 Description: Manhole with pipes connecting from outside and into the north side of the Mill Building.

Location: Plainwell Mill
 Date: November 11, 2009



Photograph No. 9
Orientation: Northeast
Description: Product storage tanks and floor drains in Specialty Minerals building.

Location: Plainwell Mill
Date: November 12, 2009



Photograph No. 10
Orientation: Overview
Description: Acid-damaged floor drain in Specialty Minerals building.

Location: Plainwell Mill
Date: November 12, 2009



Photograph No. 11
 Orientation: Southwest
 Location: Plainwell Mill
 Date: November 11, 2009
 Description: Asphalt cuts extending from Specialty Minerals building toward the Mill building.



Photograph No. 12
 Orientation: South
 Location: Plainwell Mill
 Date: November 12, 2009
 Description: Calcium carbonate silos along north exterior wall of Specialty Minerals building.



Photograph No. 13
Orientation: South
Description: Staking proposed soil sample locations in wooded area on west side of site.

Location: Plainwell Mill
Date: November 12, 2009

APPENDIX B
SULTRAC FIELD OVERSIGHT NOTES
(Four Sheets)

²
Allied-Plainwell 11-10-09

Weather: Overcast, cool (55°F)

SulTRAC: Ray Mastrolonardo

Tracy Koach

CRA: Jodie Dembrowski

Emily Stahl

10:30 Arrive on site. Meet CRA staff at former sludge treatment building. Have tail gate health and safety plan/meeting.

SulTRAC sign release forms.

10:40 Recon west portion of site.

11:30 Inspect outside perimeter of former Quality Products (Photos taken).

12:10 Break for lunch.

13:15 Back on site. Mob to Plainwell Mill. Must use flashlights since there is no power for lights. Ray keeps notes on floor plan/map provided by CRA. Tracy photographs potential areas of concern and areas of note. The following building areas were inspected: 19, 20, 17,

Allied-Plainwell

³
11-10-09

12, 15, 16, 10, 9, 9A, 9B, 9C, 9D, 9E, 9F, 23. Refer to map and photos for details on each area.

16:30 Leave site for the day.
— End of day

Tracy

11-10-09

Alfred - Plummer 11-11-09

Weather - Partly sunny, cool (39° low 54° F High)

SUTAC - Ray Mathewson, Irving Trach

CRA - Judge, Dimbrow, Emily Stahl

0800 Arrive on site. Conduct fieldgate

health & safety meeting. Must use

0830 Enter Plummer Mill. Must use

flashlights since there is no power

for lights. Ray keeps note for

floor plan/map of facility. Navy

photographs and keeps log. Able

to document paper having building

along north wall (River side) to

look for where we perform exterior

inspection of building.

1145 Complete interior inspection of

Plummer Mill. Break for lunch

1230 Conduct exterior inspection of

Plummer Mill. Ray continues

to not areas of concern. Navy

photo documents each one.

1600 Complete exterior inspection

and verify test pit locations

proposed by CRA in Memo 2, 3,

3C, 3D, 3E. Test pits 201

was offset due to gas line in

Alfred - Plummer 11-11-09

of proposed location. Test pit 306

was offset to the north to be

adjacent to an area that appeared

to be have been previously

disturbed.

1715 Review plan for inspection of

Specialty Minerals and location

being locations tomorrow. SUTAC

leave site for the day.

End of Day

11-11-09

6
Alfred - Plummer

11-12-09

Weather: Partly cloudy, cold (39°F)

Sutro: King Mountain, Liberty Road

CR: Soda Dam, Liberty Road

0730: Sutro arrives on site

0745: CR arrives on site & conducts

tailgate health & safety meeting

0800 Exit Specialty Minerals building

for inspection. Ray keeps notes

for floor plan / map of facility

Ray photographs and keeps by

Specialty Minerals made some

products used by Plummer Mill

Evidence of pipes extending from

northeast corner of building to

the mill. No indication as to

to what the pipes might have

contained / transported.

0930

Complete interior and exterior

site inspection at Specialty

Minerals.

Begin looking soil boring

proposed locations in the

northeast portion of the site

where it was reported that

Plummer Mill had sitting

Alfred - Plummer

11-12-09

Plans for the plant wastewater.

1330 The private utility locator, Jack-

amont, Inc., points out pipes

traced from the Plummer Mill

to the river and verifies there is

a pipe extending from Specialty

Minerals to the mill but could

not verify what has been in the

past.

1500 Break for lunch

1530 Leave proposed boring and

monitoring well locations in

wooded area along the west

boundary of the site. Half of

the wooded area is within an area

fenced with a locked gate. Cannot

access gated area so proposed soil

boreings located within the fenced

area will be located day of the

time of drilling.

1630 Leave site for Chicago. The

planning and boring monitoring

will be done.

58139 moved to MW15

location and MW15 moved to

location

11-12-09

Alfred - Plummer

SB139 location

Moved MUD14 to north of fence
line adjacent to access road.

End of Day

off each

11-12-09